

distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 846 in connection with Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT TWO

(Conspiracy to Possess with Intent to Distribute Marijuana)

That from on or about May 1, 2016, through on or about October 21, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

**(1) WALTER WILLIAMS a/k/a "BUBBA,"
(5) LAYLA KEANY,
(6) BOBBY MARTINEZ,
(8) ANTONIO MENDEZ-RAMOS,
(9) CHADWICK NICHOLSON,
(10) RUBEN ANGEL PEREZ a/k/a "EL REY,"
(13) SHANA WALKER**

did knowingly and intentionally combine, conspire, and agree together and with each other, and with others, both known and unknown to the Grand Jury, to knowingly possess with the intent to distribute a Schedule I controlled substance, to-wit: marijuana; all in violation of Title 21, United States Code, Section 846 in connection with Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(D).

COUNT THREE

(Distribution of Methamphetamine)

That on or about June 7, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(4) JAMES HOWELL a/k/a "FLIP,"

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT FOUR

(Distribution of Methamphetamine)

That on or about June 20, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(4) JAMES HOWELL a/k/a “FLIP,”

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT FIVE

(Distribution of Methamphetamine)

That on or about June 21, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(1) WALTER WILLIAMS a/k/a “BUBBA,”

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT SIX

(Distribution of Methamphetamine)

That on or about June 23, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(1) WALTER WILLIAMS a/k/a “BUBBA,”

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT SEVEN

(Distribution of Methamphetamine)

That on or about June 29, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(1) WALTER WILLIAMS a/k/a "BUBBA,"

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT EIGHT

(Distribution of Methamphetamine)

That on or about July 6, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(1) WALTER WILLIAMS a/k/a "BUBBA,"

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT NINE

(Distribution of Methamphetamine)

That on or about July 25, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(1) WALTER WILLIAMS a/k/a "BUBBA,"

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT TEN

(Distribution of Methamphetamine)

That on or about August 11, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(1) WALTER WILLIAMS a/k/a "BUBBA,"

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT ELEVEN

(Distribution of Methamphetamine)

That on or about August 19, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(1) WALTER WILLIAMS a/k/a "BUBBA,"

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT TWELVE

(Distribution of Methamphetamine)

That on or about August 25, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(1) WALTER WILLIAMS a/k/a "BUBBA,"

did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT THIRTEEN

(Possession with Intent to Distribute Methamphetamine)

That on or about October 8, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(3) ELIZABETH GALLAHER

aided and abetted by,

(1) WALTER WILLIAMS a/k/a "BUBBA," and

(7) RUSSELL TODD MATHIS

did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

(Possession with Intent to Distribute Methamphetamine)

That on or about October 20, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(1) WALTER WILLIAMS a/k/a "BUBBA,"

(6) BOBBY MARTINEZ,

(8) ANTONIO MENDEZ-RAMOS,

(10) RUBEN ANGEL PEREZ a/k/a "EL REY,"

(11) ASHLEE SHAW, and

(13) SHANA WALKER

aided and abetted by each other, and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

(Possession with Intent to Distribute Marijuana)

That on or about October 20, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(9) CHADWICK NICHOLSON

did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule I controlled substance, to-wit: marijuana; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(D).

COUNT SIXTEEN

(Possession with Intent to Distribute Methamphetamine)

That on or about October 20, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

**(7) RUSSELL TODD MATHIS, and
(12) DANNA STOKES**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

(Possession with Intent to Distribute Methamphetamine)

That on or about October 21, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(7) RUSSELL TODD MATHIS

did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to-wit: methamphetamine, in an amount in excess of 50 grams; all in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(viii).

COUNT EIGHTEEN
**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime and
Carrying a Firearm During and in Relation to a Drug Trafficking Crime)**

That on or about October 21, 2016, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

(7) RUSSELL TODD MATHIS

did knowingly possess a firearm, to-wit: one (1) 38 Special, Model Undercover, revolver, Serial Number 98184, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the offense set forth in Count Seventeen of this Indictment, and did knowingly carry said firearm during and in relation to the drug trafficking crime set forth in Count Seventeen; all in violation of Title 18, United States Code, Section 924(c)(1).

GENERAL FORFEITURE NOTICE AS TO ALL DEFENDANTS
(21 U.S.C. § 853, 18 U.S.C. § 924(d)(1), and 28 U.S.C. § 2461(c) – Criminal Forfeiture)

1. The allegations contained in Counts One through Eighteen of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeitures to the United States of America, pursuant to the provisions of Title 21, United States Code, Section 853, and/or Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense(s) in violation of Title 21, United States Code, Section 846, in connection with Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) set forth in Count One; and/or Title 21, United States Code, Section 846, in connection with Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) set forth in Count Two; and/or Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) set forth in Counts Three through Four, Six through Fourteen, and Sixteen through Seventeen; and/or Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) set forth in Count Five, and/or

Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D) set forth in Count Fifteen; and/or Title 18, United States Code, Section 924(c)(1) set forth in Count Eighteen of the Indictment the defendant(s),

- (1) WALTER WILLIAMS a/k/a "BUBBA,"**
- (2) MILTON DOBBIN EVANS,**
- (3) ELIZABETH GALLAHER,**
- (4) JAMES HOWELL a/k/a "FLIP,"**
- (5) LAYLA KEANEY,**
- (6) BOBBY MARTINEZ,**
- (7) RUSSELL TODD MATHIS,**
- (8) ANTONIO MENDEZ-RAMOS,**
- (9) CHADWICK NICHOLSON,**
- (10) RUBEN ANGEL PEREZ a/k/a "EL REY,"**
- (11) ASHLEE SHAW,**
- (12) DANNA STOKES, and**
- (13) SHANA WALKER**

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly and indirectly, as a result of such offense(s), and any property, real or personal, used, or intended to be used in any manner or part to commit, or to facilitate the commission of the offense(s); and/or any firearms and ammunition involved in the commission of the offense(s), pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon exercise of due diligence;
- (b) has been transferred, sold to or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

- (c) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and/or Title 18, United States Code, Section 924(d)(1), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

DETAILED FORFEITURE NOTICE AS TO (6) BOBBY MARTINEZ
(21 U.S.C. § 853- Criminal Forfeiture)

1. The allegations contained in Counts One, Two, and Fourteen of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeitures to the United States of America, pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of the offense(s) in violation of Title 21, United States Code, Section 846, in connection with Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(A)(viii) set forth in Count One; and/or Title 21, United States Code, Section 846, in connection with Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) set forth in Count Two; and/or Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii) set forth in Count Fourteen of this Indictment, the defendant,

(6) BOBBY MARTINEZ,

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly and indirectly, as a result of such offense(s), and any property, real or personal, used, or intended to be used in any manner or part to commit, or to facilitate the commission of the

offense(s), including, but not limited to thirty-one thousand and five hundred dollars (\$31,500.00) in United States funds.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon exercise of due diligence;
- (b) has been transferred, sold to or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL.

/s/ Foreperson of the Grand Jury

FOREPERSON OF THE GRAND JURY

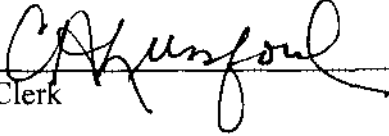
G.F. PETERMAN, III
UNITED STATES ATTORNEY

Presented by:



ELIZABETH S. HOWARD
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 11th day of April, AD 2017.



Deputy Clerk